

EXHIBIT 6

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re Flint Water Cases

Civil Action No. 5:16-cv-10444-JEL-
MKM (consolidated)

Hon. Judith E. Levy
Mag. Mona K. Majzoub

Elnora Carthan, et al. v. Governor
Rick Snyder et al.

Civil Action No. 5:16-cv-10444-JEL-
MKM

REBUTTAL DECLARATION OF PIERRE GOOVAERTS, Ph.D.

My name is Pierre Goovaerts, Ph.D. I submit this rebuttal declaration in response to defendant VNA's opposition to class plaintiffs' motion for class certification, ECF No. 1369, and also in response to defendant VNA's motion, ECF No. 1385, to exclude my declaration and testimony.

1. In my initial declaration, I provided an estimate of the number of children residing in Flint who were "potentially exposed" to unfiltered Flint tap water. ECF No. 1208-94. In their motion to exclude my report and testimony, VNA argues that I reached an unfounded conclusion that all of the children born in Flint meet the class definition of exposure to contaminated water. ECF 1385, PageID 52923. This is a false characterization of my conclusions, as I said precisely the opposite in my declaration: "the true number of 'potentially exposed plaintiffs' is likely to be lower." (Goovaerts Decl. ¶19; ECF No. 1208-94, PageID 36082)
2. Since my initial declaration, the City of Flint has produced an updated database of those houses in Flint where the composition of lead or galvanized service lines have been recorded. I have reviewed the houses for which the City of Flint performed water sampling in 2008 and 2011 as part of the City's Lead and Copper Rule sampling and cross referenced those houses against City of Flint data sources that identify the presence of either lead or galvanized

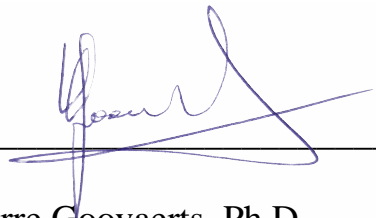
water lines (public or private). According to those data sources, the following houses had lead or galvanized service lines:

- a. 809 East 3rd St.
 - b. 822 East 6th St.
 - c. 1651 Woodlawn Park Dr.
 - d. 710 Leland St.
 - e. 415 West 4th Ave.
 - f. 2648 Swayze St.
 - g. 1809 East Court St.
3. It is possible, for homes that received upgraded plumbing after 1986, to consult Flint databases and similarly determine the composition of the service lines for those houses. For example, class representative Ronda Kelso's house, located at 119 Grace Street, had lead service lines during the Minors Subclass period.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and recollection.

Executed on: March 23, 2021

By:


A handwritten signature in blue ink, appearing to read 'Pierre Goovaerts', is written over a horizontal line. The signature is stylized with a large loop at the end.

Pierre Goovaerts, Ph.D.